REMARKS

This Amendment is filed in response to the Office Action of July 10, 2009 in which claims 1-22, 24-31 and 64-85 and 88-90 were rejected.

I. Amendments

In independent **claims 1, 28, 30, 31 and 89**, the previously introduced features have been cancelled again. Instead, they have been restricted with the features of claims 3 and 4.

Claims 3-5 and 65-67 have been cancelled.

Original **claim 23**, which contained some of the features that have now been cancelled again from the independent claims, has been reintroduced as new claim 91.

II. Subject matter of the claims

Claim 1 defines a method of creating an ad-hoc connection between at least two electronic devices for enabling an interaction between said at least two electronic devices. The method comprises the following features at a first one of said electronic devices:

A detecting a hugging state between said first electronic device and a second one of said electronic devices, a hugging state being assumed to be given if said first electronic device and said second electronic device are at least in close vicinity to each other and a piece of information is received by said first electronic device directly from said second electronic device;

B in case a hugging state is detected, obtaining a handle proceeding from said received piece of information, said handle comprising at least an address of at least one other of said at least two electronic devices than said first electronic device;

C establishing a communication channel between said first electronic device and said at least one other of said electronic devices using said address included in said handle;

D detecting said hugging state requires receiving a content of a radio frequency identification tag of said at least one other of said electronic devices as said piece of information from said second electronic device;

E said first device obtains said handle by retrieving a stored address to which said received content of said radio frequency identification tag is mapped.

Independent **claims 28, 30, 31 and 89** comprise corresponding features.

III. Novelty and non-obviousness

The Examiner was of the opinion that *Libes* (US 2003/0162556) discloses features A-D of claim 1 and that the disclosure of *Peters* (US 6,6,01,093) renders the additional use of feature E of claim 1 obvious. This estimation is contested.

Claim 1 requires that a stored address, to which the received content of a radio frequency identification tag is mapped, is retrieved and that the address is used for establishing a communication channel (features C-E).

The Examiner was in particular of the opinion that *Libes* teaches that detecting a hugging state requires receiving an RFID tag. Further, the Examiner considered *Peters* to disclose:

- performing an address resolution by sending a handle comprising an address
- in a radio frequency identification tag environment
- wherein an identification is mapped to a stored address

First of all, *Peters* does not disclose any radio frequency identification tag environment in col. 6, lines 44-55. It only discloses a Bluetooth environment, and Bluetooth technology is a different technology than radio frequency identification tag technology. Furthermore, the other two features considered to be discloses by *Peters* do not match the features of claim 1.

Peters concentrates throughout the document on storing received host names and IP addresses that are associated to each other (see e.g. col. 1, lines 50-64; col. 8, lines 21-55). This is only a preparatory measure for enabling an address resolution for a communication. The stored mapping in a device is to substitute in a flexible manner the function of a DNS server usually provided in a network. The actual use

of the stored information for establishing a communication (including a retrieving of a stored address) is barely mentioned. There are only statements like "*using the IP address information and the address source indicators stored at the second device for communicating from the second device to the first device*" (col. 3, lines 27-32) and "*This creates ... an internal routing table which may enable the local IP stack to resolve a host name provided by a local application to a remote IP address ... in the absence of a DNS server*" (col. 8, lines 50-55).

It is thus clear that *Peters* does not disclose a situation in which a device receives a host name (as some kind of content) from another device, retrieves a stored address that is mapped to this received host name and uses this address in the establishment of a connection. Instead, an internal application is assumed to provide the host name, for which an IP address may then be retrieved.

Consequently, the teachings of *Peters* would not appear applicable at all to the teachings of *Libes* to a skilled person.

Moreover, even if considering the teachings of *Peters* in addition to the teachings of *Libes*, a skilled person would come at the most to the idea of applying the teaching of *Peters* to *Libes* as far as *Libes* suggests using Bluetooth for a handshaking (paragraph 0039), since Bluetooth is an option that is mentioned in both documents. There would be no incentive to combine the teachings of *Peters* in any way with the use of content of a radio frequency identification tag.

It has to be noted that also *Libes* does not mention the use of a radio frequency identification tag in paragraph 0038 (features D and E of claim 1). An RFID tag is well known to store content itself and to transmit only this stored content and not to enable an exchange of arbitrary data. *Libes* mentions a "radio-frequency transmitter" (par. 0038), but this is a very general expression and the component in associated Figure 10 does not show any means for storing content. *Libes* further mentions Bluetooth, 802.11a and 802.11b as examples (par. 0039). A Bluetooth, 802.11a or 802.11b component are suited to transmit arbitrary data that is provided to the component for transmission. The same applies to the Infrared technology, which is mentioned in *Peters* in addition to Bluetooth. Thus, requiring the use of an RFID tag as in claim 1 is not just a question of different terms

describing the same thing, but rather a question of different structure and functionality.

Summarized, none of cited references teaches or suggests that specifically radio frequency identification tag content is received (feature D) or that specifically radio frequency identification tag content is mapped to a stored address (feature E), and none of the cited references teaches or suggests retrieving a stored address that is mapped to received content, and much less mapped to received content of an radio frequency identification tag (features C+E).

On the whole, it becomes apparent that claim 1 is neither anticipated nor rendered obvious by the cited references.

The same applies to the **other independent claims**, which comprise corresponding features, and consequently to the **dependent claims** as well. Withdrawal of the various art rejections is requested.

The objections and rejections of the Office Action of July 10, 2009, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of amended claims 1-2, 6-22, 24-31, 64, 68-85, and 88-91 to issue, is earnestly solicited.

Respectfully submitted,

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